

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 4:24-CV-10017-MARTINEZ/SANCHEZ

AKARI JOHNSON and
HAZEL THOMPSON,

Plaintiffs,

vs.

MMI 82, LLC and
THE ENTHUSIAST LLC,

Defendants.

JOINT MOTION TO EXTEND PRETRIAL DEADLINES AND CONTINUE TRIAL

Plaintiffs, Akari Johnson and Hazel Thompson, jointly with Defendants, MMI 82, LLC and The Enthusiast LLC (collectively, the “Parties”), pursuant to Federal Rule of Civil Procedure 6(b)(1)(A) and Local Rule 7.6, hereby respectfully request that the Court extend the remaining pretrial deadlines and continue the civil trial set for the above-styled matter, and in support thereof, state as follows:

1. On May 31, 2024, the Court entered an Order Setting Civil Trial Date and Pretrial Schedule, Requiring Mediation, and Referring Certain Motions to Magistrate Judge. DE 13. The Order set a May 29, 2025 deadline for mediation and scheduled the trial for the two-week period beginning on July 28, 2025.

2. On March 19, 2025, the Court entered a Paperless Order extending the deadline to file *Daubert*, summary judgment, and all other dispositive motions to June 3, 2025. DE 36.

3. On March 26, 2025, the Court entered a Paperless Order extending the deadline for discovery completion to May 17, 2025. DE 38.

4. On April 30, 2025, Defendants MMI 82, LLC and The Enthusiast LLC filed a

Motion/Stipulation for Substitution of Counsel [DE 40], which the Court granted on May 2, 2025 [DE 41].

5. Good cause exists to extend the current pretrial deadlines and continue the trial in this matter in light of the substitution of counsel for Defendants at this stage of the proceeding as well as to complete discovery that remains outstanding.

6. With pretrial dispositive motions currently due in just over a month and trial scheduled in approximately three months, new counsel for Defendants desires additional time to get up to speed on the matter to be able to prepare for trial. *See Exhibit A* (Affidavit of A. Narula, Esq.). Specifically, defense counsel needs additional time to review the discovery taken in this matter to date to be able to prepare any pretrial discovery motions.

7. Defense counsel also needs more time to complete additional discovery. *Id.* Specifically, the undersigned would like to depose Daniella Rodriguez and Aileen Gonzalez, who both provided declarations in connection with this matter but have not yet been deposed by any party. *Id.* Defense counsel would not be able to complete this additional discovery by the current discovery deadline of May 17. *Id.*

8. Finally, mediation in this matter was scheduled for May 6, 2025, which the parties are now in the process of rescheduling. To allow the Parties to have meaningful and productive settlement discussions at the mediation, the Parties would like to postpone the mediation to allow Defendants' new counsel sufficient time to evaluate the matter and potential settlement options.

WHEREFORE, the Parties respectfully request that the Court extend the mediation, discovery, pretrial dispositive motions, and other pretrial deadlines by 45 days, as set forth in the Proposed Agreed Order, attached hereto as **Exhibit B**, and continue the trial until the September 2025 trial period.

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